

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re ) Case No. \_\_\_\_\_  
 )  
 ) NOTICE OF HEARING ON  
 ) (Check **ONE**)  
 ) Motion to Extend/Impose Stay Per §362(c)  
 ) Debtor's Motion to Impose Stay Per §362(n)  
 )  
Debtor(s) )

YOU ARE NOTIFIED that the attached Motion was filed by: \_\_\_\_\_.

The name and service address of the moving party's attorney (or moving party, if no attorney) are: \_\_\_\_\_  
\_\_\_\_\_.

(If debtor is the moving party) The debtor's address and Taxpayer ID#(s) (last 4 digits) are: \_\_\_\_\_  
\_\_\_\_\_.

**Notice is given that:**

A **Telephone Hearing** on the Motion, at which testimony will be taken if offered and admissible, will be held as follows:

**Date:**

**Time:**

**Call In Number:** (888) 684-8852

**Access Code:** 3702597

The moving party must be present at the hearing.

**TELEPHONE HEARING REQUIREMENTS**

1. You must call in and connect to the telephone hearing line or personally appear in the judge's courtroom no later than your scheduled hearing time. The court will not call you. If you have problems connecting, call the court at (503) 326-1500 or (541) 431-4000.
2. You may be asked to call again from another phone if your connection is weak or creates static or disruptive noise.
3. Please mute your phone when you are not speaking. If you do not have a mute function on your phone, press \*6 to mute and \*6 again to unmute if you need to speak. Do not put the court on hold if it will result in music or other noise. If available, set the phone to "Do Not Disturb" so it will not ring during the hearing.
4. When it is time for you to speak, take your phone off the "speaker" option or headset to minimize background noise and improve sound quality. Position the telephone to minimize paper rustling. Do not use a keyboard or talk with others in the room. Be aware that telephone hearings may be amplified throughout the courtroom.
5. Do not announce your presence until the court calls your case. Simply stay on the line, even if there is only silence, until the judge starts the hearings, and then continue to listen quietly until your case is called.
6. Whenever speaking, first identify yourself.
7. Be on time. The judge may handle late calls the same as a late appearance in the courtroom.

\_\_\_\_\_  
Signature

I certify that on \_\_\_\_\_ I served copies of this Notice and the Motion on the debtor(s), all creditors, all parties requesting special notice, any Creditors' Committee Chairperson, and their respective attorneys.

\_\_\_\_\_  
Signature & Relation to Moving Party

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3 **UNITED STATES BANKRUPTCY COURT**  
4 **DISTRICT OF OREGON**

5 In re: ) Case no.: 19-30305-tmb13  
6 )  
7 GLORIA JEAN CARTER, ) **MOTION FOR EXTENSION OF**  
8 Debtor. ) **AUTOMATIC STAY**

9 The Debtor, by and through her counsel W. George Senft, hereby moves this Court, pursuant to section  
10 362(c)(3)(B) for an order continuing the automatic stay provided under section 362(a) as to all creditors. In  
11 support of this motion, the Debtor states as follows:

- 12 1. On January 28, 2019, Debtor filed a petition under Chapter 13 of the United States Bankruptcy Code.  
13 2. On June 17, 2018, Debtor has previously filed a petition under Chapter 13 of the United States  
14 Bankruptcy Code. This case was dismissed on July 10, 2018 for failure to file missing documents.  
15 The case number was 18-32124-dwh13.  
16 3. Debtor also filed a bankruptcies in 2015, case no. 15-34239 and in 2004, case no. 04-38003.  
17 4. Debtor filed a complete set of bankruptcy documents to avoid a dismissal for failure to complete the  
18 emergency filing.  
19 5. The petition in this case has been filed in good faith. Debtor believes that the Chapter 13 plan she has  
20 submitted will be confirmed and that she will be able to fully perform under the terms of the plan.

21 **WHEREFORE** the debtor requests that this Court continue the automatic stay under section 362(a)  
22 as to all creditors for the duration of this chapter 13 proceeding, or until such time as the stay is terminated  
23 under section 362(c)(1) or (c)(2), or a motion for relief is granted under section 362(d).

24 DATED: February 11, 2019

25  
26 /s/ W. George Senft  
27 W. George Senft, OSB# 081213  
28 Attorney for Debtor

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3 **UNITED STATES BANKRUPTCY COURT**  
4 **DISTRICT OF OREGON**

5 In re: ) Case no. 19-30305-tmb13  
6 )  
7 GLORIA JEAN CARTER, )  
8 Debtor. ) **DECLARATION OF DEBTOR IN**  
9 ) **SUPPORT OF MOTION FOR**  
 ) **EXTENSION OF AUTOMATIC STAY**

10 I, Gloria Jean Carter, hereby declare and say:

11 1. On January 28, 2019, I filed the above referenced Chapter 13 proceeding to stop the sale of my  
12 residence.

13 2. On June 17, 2018, I previously filed an emergency Chapter 13 petition with the case number 18-  
14 32124. This case was dismissed for failure to complete the emergency filing in a timely manner. I was not  
15 able to complete the filing because I was hospitalized for pneumonia related reasons.

16 3. No other cases were dismissed within the 12 month period of the filing of this case.

17 4. However, I filed a Chapter 13 bankruptcy in 2015, case no. 15-34239. This case was dismissed  
18 for failure to make the plan payments. Another Chapter 13 was filed in 2004, case no. 04-38003.

19 5. To avoid another dismissal for the same reason, I filed a complete petition.

20 6. I am convinced that this filing will succeed. I have sufficient monthly income to make the plan  
21 payments and pay for my monthly living expenses, including the mortgage payments.

22 I declare under penalty of perjury that the information contained above is true and correct to the best  
23 of my knowledge, information, and belief.

24 DATED: January 26, 2019

25 /s/ Gloria Jean Carter  
26 Gloria Jean Carter  
27 Debtor  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 11, 2019, a copy of Motion for Extension of Time for Filing of Documents and a Declaration in Support of Motion for Extension of Time for Filing of Documents was served electronically or by regular United States mail to all creditors, the Chapter 13 Trustee and the United States Trustee.

And via certified mail to:

M&T Bank  
c/o Paul W. Kucinski, Auth. Rep.  
One M&T Plaza  
Buffalo, NY 14203

DATED: February 11, 2018

/s/ W. George Senft  
W. George Senft, OSB# 081213  
Attorney for Debtors